

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION

BIJU MUKRUKKATTU JOSEPH, et al

\*

Civ. No. 1:13-cv-0324

Plaintiffs

\*

Vs.

\*

SIGNAL INTERNATIONAL, LLC, et al

Defendants

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\* \* \* \* \*

MOTION AND MEMORANDUM OF MALVERN C. BURNETT,  
THE LAW OFFICES OF MALVERN C. BURNETT, A.P.C., AND  
GULF COAST IMMIGRATION LAW CENTER, L.L.C.,  
TO REASSERT MOTIONS TO DISMISS (DOC. NO. 32) AND MOTION TO DISMISS FOR  
LACK OF JURISDICTION (DOC .NO.31).

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Now comes Malvern C. Burnett, the Law Offices of Malvern C. Burnet, and the Gulf Coast Immigration Law Center, L.L.C., (hereinafter the “Burnett Defendants”) who herewith move this Court to reassert all Motions to Dismiss filed by the Burnett Defendants, those being the Motion to Dismiss, doc. No. 32, and the Motion to Dismiss for Lack of Jurisdiction, Doc. No. 31, along with all Reply Memorandum to Plaintiffs oppositions, in particular the Burnett Defendants’ Reply Memorandum to Plaintiffs’ response to the Motion to Dismiss, Doc. No. 51, and the Burnett Defendants’ Reply to Plaintiffs’ response to the Motion to Dismiss for Lack of Jurisdiction, Doc. No. 50.

The Burnett Defendants show that this Court, by order dated January 16, 2014, Denied

as Moot, the Motions to Dismiss filed by the Burnett Defendants, with the right to reassert same, because Plaintiffs had filed a Second Amended Complaint in which two additional individuals were named as plaintiffs.

All allegations and claims against the Burnett Defendants , as well as the basis for those allegations and claims, remained the same. As such, there is no change in the reasons and basis for the Burnett Defendants' Motions to Dismiss, or in their Reply Memorandum to Plaintiffs' respective oppositions. So as not to overly burden the record with numerous motions, memorandums, and references to different document numbers, especially considering that there has been no change in the law or arguments by the Burnett Defendants in support of their Motions to Dismiss or their Reply Memorandums, the Burnett Defendants herewith reassert and reiterate those motions and supporting memorandum as though copied here in extenso, and adopt and reaver their Motion to Dismiss, (Doc. No. 51), and Motion to Dismiss for Lack of Jurisdiction, (Doc. No. 50). Similarly, to the extent it is believed Plaintiffs will reassert their oppositions to these motions, the Burnett Defendants also reassert and reaver all arguments and law asserted in their Reply Memorandums, Doc. No, 51, and Doc. No. 50, respectfully.

Respectfully submitted,

s/ Timothy W. Cerniglia  
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Attorney for Malvern C. Burnett,  
The Law Offices of Malvern C. Burnett,  
A.P.C. , and the Gulf Coast Immigration  
Law Center, LLC.

CERTIFICATE OF SERVICE

This is to certify that a copy of this motion has been served electronically on Plaintiffs  
and the Signal Defendants with the Clerk of Court using the CM/ECF system, this 23rd day of  
January, 2014

s/ Timothy W. Cerniglia